

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

RICHARD A. GORMAN,

Plaintiff,

-against-

ILLYA SHPETRIK,

Defendant.

Civil Action No. 2:20-cv-04759-JCJ

MOTION TO DISMISS

Defendant Illya Shpetrik, (“Defendant”) by and through his undersigned counsel, respectfully moves the Court to dismiss this lawsuit and all counts against him under Rules 8 and 12(b)(2), 12(b)(5) and 12(b)(6) of the Federal Rules of Civil Procedure; and grant all such further relief as the Court may deem just and proper. Defendant concurrently files herewith a Memorandum of Law and a Declaration in support of this Motion, and incorporates both herein.

Dated: April 26, 2021

By: /s/ Matthew Faranda-Diedrich
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Counsel to Defendant Illya Shpetrik

Dated: April 26, 2021

/s/ Matthew Faranda-Diedrich
Matthew Faranda-Diedrich, Esquire